02,122	UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS		
240.41	EASTERN SECTION	201 JUN 24 P 3: 41	
HELDER PEIXOTO,	)	U. D. DISTRICT COURT DISTRICT OF MASS.	
Plaintiff	)		
vs.	) ) Case No. 04-CV-10435 (JL'	Case No. 04-CV-10435 (JLT)	
EQUIFAX CREDIT REPORTING AGENCY, TOM CHAPMAN,	)		
Defendants	)		

## NOTICE OF MOTION TO CONSOLIDATE

Pursuant to Rule 42 of the Federal Rules of Civil Procedure, Defendants Equifax Information Services, LLC, ,incorrectly named as "Equifax Credit Reporting Agency," ("Equifax"), Experian Information Solutions, Inc., incorrectly named as "Experian," ("Experian"), and Trans Union LLC ("Trans Union") respectfully request that the Court consolidate the following three matters filed by Plaintiff Helder Peixoto on February 27, 2004: (1) Peixoto v. Equifax Credit Reporting Agency, et al., 1:04-cv-10435 (JLT); (2) Peixoto v. Experian, Craig Smith, et al., 1:04-cv-10436 (JLT); and (3) Peixoto v. Transunion LLC, et al., 1:04-cv-10437 (JLT).

For the reasons set forth in the attached Memorandum of Reasons, Equifax, Experian and Trans Union pray that the court grants their respective Motions to Consolidate these three cases.

Dated: Boston, Massachusetts
June 74, 2004

TRANS UNION LLC

Mardic Marashian, Esq. (BBO#548607)

BONIN & MARASHIAN 77 Franklin Street, 4th Floor Boston, Massachusetts 02110

Tel: (617) 723-2525

Dated: New York, New York June 22, 2004 EXPERIAN INFORMATION SOLUTIONS, INC.

Albert J. Rota, Esq., pro hac vice

JONES DAY

222 E. 41st Street

New York, New York 10017

Tel: (212) 326-3958 Fax: (212) 755-7306

- and -

Robert S. White (BBO#552229) Bourgeois, Dresser, White & Beard 4 Dix Street Worcester, MA 01609 Telephone: 508-798-8801

Fax: 508-754-1943

Dated: Boston, Massachusetts June 14, 2004 EQUIFAX INFORMATION SERVICES, LLC

DAMO Wilson Aft.

David B. Wilson, Esq. (BBO# 548359)

ROBINSON & COLE One Boston Place

Boston, Massachusetts 02108-4404

Tel: (617) 557-5900